

THE HONORABLE JAMAL N. WHITEHEAD

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

IN RE VALVE ANTITRUST LITIGATION

No. 2:21-cv-00563-JNW

**STIPULATED MOTION FOR  
EXTENSION OF MERITS EXPERT  
DISCOVERY DEADLINE TO TAKE  
CERTAIN DEPOSITIONS**

**NOTE ON MOTION CALENDAR:  
April 11, 2025**

Plaintiffs Wolfire Games, LLC, Dark Catt Studios Holdings, Inc., and Dark Catt Studios Interactive LLC and Defendant Valve Corporation, by and through their undersigned counsel of record, hereby stipulate and agree as follows:

1. The Court entered a Case Schedule on August 23, 2022 (Dkt. #98), which set certain case deadlines through summary judgment briefing.

2. Pursuant to the Case Schedule, Merits Expert Discovery closes 165 days after any grant of class certification (Dkt. #98, at 2).

3. On November 26, 2024, this Court issued its Order Granting Plaintiffs' Motion for Class Certification (Dkt. #391), which set May 12, 2025, as the close of Merits Expert Discovery pursuant to the Case Schedule.

4. The parties have been working to complete merits expert discovery, including disclosing Opening Merits Expert Reports and Response Merits Expert Reports, preparing for disclosure of Rebuttal Merits Expert Reports under the deadline set forth in the Case Schedule, and scheduling merits expert depositions. The parties anticipate taking four merits expert depositions by May 12, 2025.

5. Due to scheduling constraints, the parties request a four-day extension of merits expert discovery to conduct expert depositions of the following witnesses:

a. Deposition of Dr. Steven Schwartz, to be conducted on May 14, 2025; and

b. Deposition of Professor Joost Rietveld, to be conducted on May 16, 2025.

6. The parties respectfully request that the Court enter the below Order extending the deadline to complete Merits Expert Discovery as stipulated.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

DATED this 11th day of April, 2025.

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/s/ Alicia Cobb

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1 PURSUANT TO STIPULATION, IT IS SO ORDERED.

2 DATED this \_\_\_\_ day of \_\_\_\_\_, 2025.

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Honorable Jamal N. Whitehead  
UNITED STATES DISTRICT JUDGE  
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